

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Greensboro Division
11 cv 198**

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| THE NORTH CAROLINA GROWERS' ASSOCIATION, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| HILDA L. SOLIS, U.S. DEPARTMENT OF LABOR, |) | |
| MAS LABOR, MAS-H2A, K-T LABOR, AWMA, L.L.C., |) | |
| ANDREW JACKSON, and LABOR SERVICES |) | |
| INTERNATIONAL, |) | |
| |) | |
| Defendants. |) | |
| |) | |

PLAINTIFF'S MOTION FOR EXTENSION OF TIME

Plaintiff the North Carolina Growers' Association, Inc. ("NCGA"), hereby moves for an extension of time, through and including July 1, 2011, in which to respond to **MAS Labor, MAS H-2A, and Labor Services International's Motion to Dismiss Plaintiff's Amended Complaint [Doc. 32]**, and **Defendant Andrew Jackson's Motion to Dismiss and to Drop Party Defendant, or, Alternatively, to Dismiss for Failure to Join Party [Doc. 36]**. In support of its Motion, NCGA shows the following:

1. The motion of Defendants MAS Labor, MAS H-2A, and Labor Services International was filed on May 9, 2011. Therefore, the time for NCGA to respond has not yet expired.
2. The motion of Defendant Jackson was filed on May 16, 2011. Therefore, the time for NCGA to respond has not yet expired.

3. Meanwhile, NCGA has been in communication with counsel for the Defendants Hilda L. Solis and the U.S. Department of Labor (“the Government Defendants”), and he has indicated that administrative action is forthcoming that may render this action moot in its entirety. For this reason, the Government Defendants have obtained an extension of time to file answer or otherwise responsively plead, through and including June 27, 2011.

4. Counsel for NCGA has consulted with counsel for Defendants MAS Labor, MAS H-2A, and Labor Services International, and with Defendant Jackson, and they have no objection to the requested extension of time for NCGA.

For the reasons stated above, Plaintiff NCGA respectfully requests that this Motion for Extension of Time be granted.

This the 24th day of May, 2011.

/s/ W. R. Loftis, Jr.

W. R. Loftis, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date copies of the foregoing **MOTION FOR EXTENSION OF TIME** and **PROPOSED ORDER** were filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Aaron J. Longo, Esq.
McGuire Woods LLP
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100 N. Tryon Street
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In addition, the following non-CM/ECF participating parties were served this date via United States First Class Mail, postage prepaid, and addressed as follows:

HILDA L. SOLIS,
in her official capacity as
United States Secretary of Labor,
200 Constitution Avenue, NW,
Washington, DC 20210

Civil Process Clerk
US Attorney's Office - MDNC
101 South Edgeworth St., 4th Floor
Greensboro, NC 27401

THE UNITED STATES DEPARTMENT
OF LABOR, 200 Constitution Avenue, NW,
Washington, DC 20210

Attorney General, Eric Holder
US Department of Justice
900 Pennsylvania Ave., NW
Washington, DC 20530-0001

Kentucky Tennessee Labor Corporation
c/o Patricia Soward
1646 Duntreath Drive
Lexington, KY 40504-2353

Kentucky Tennessee Labor Corporation
c/o Patricia Soward
3209 Monida Court
Lexington, KY 40515-5435

This the 24th day of May, 2011.

//s/ W. R. Loftis, Jr.
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